

UNITED STATES DISTRICT COURT
for the
Middle District of Tennessee

United States of America)
v.)
) Case No. 25-mj-4112
LUIS ANTONIO GARCIA GUILLEN)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 28, 2025 in the county of Davidson in the
Middle District of Tennessee, the defendant(s) violated:

Code Section

Offense Description

Title 8, United States Code, Section 1326(a)

Illegal Re-entry

This criminal complaint is based on these facts:

See Attached affidavit

Continued on the attached sheet.

/s/ Jacqueline A. Richards
Complainant's signature

SA Jacqueline A. Richards, HSI

Printed name and title

Sworn to me remotely by telephone, in compliance with Fed. R. Crim. P. 4.1.

Date: 03/29/2025



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Judge's signature

City and state: Nashville, Tennessee

U.S. Magistrate Judge Alistair E. Newbern

Printed name and title

STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jacqueline A. Richards, having been duly sworn, hereby depose and swear to the following:

1. I, Jacqueline A. Richards, am a Special Agent with the U.S. Department of Homeland Security, specifically the U.S. Immigration and Customs Enforcement Agency, Homeland Security Investigations, currently assigned to the Middle District of Tennessee. I have been so employed since November of 2009. As a federal agent for the U.S. Department of Homeland Security, I am familiar with federal statutes, including: 8 U.S.C. § 1326(a), which makes it unlawful for a removed alien to be present in the United States without authorization.

2. The facts contained in this affidavit are based on first-hand knowledge or information learned during this investigation from law enforcement sources or from witnesses. This affidavit does not contain each and every detail known by me regarding this investigation. Instead, this affidavit provides information necessary to establish probable cause to arrest Luis Antonio Garcia GUILLEN for a violation of 8 U.S.C. § 1326(a). Except where indicated, all statements referenced herein are set forth in substance and in part, rather than verbatim:

3. On or about March 28, 2025, officers from the 23rd Judicial District Drug Task Force conducted a traffic stop where they encountered Luis Antonio Garcia GUILLEN. When asked for a driver's license, Luis Antonio Garcia GUILLEN presented a driver's license from Mexico.

4. Officers received consent to search the vehicle Luis Antonio Garcia GUILLEN was driving, and Agents seized a duffle bag filled with a large amount of cash. Following the traffic stop, Luis Antonio Garcia GUILLEN told Agents that he believed the money was drug proceeds that Luis Antonio Garcia GUILLEN was to deliver to an unknown individual who would send the money to Mexico.

5. Luis Antonio Garcia GUILLEN was placed in the front seat of the car belonging to the officer from the 23rd Judicial District Drug Task Force. An agent with Homeland Security Investigations asked Luis Antonio Garcia GUILLEN about his citizenship status, and Luis Antonio Garcia GUILLEN stated he was a citizen of Mexico. The agent asked Luis Antonio Garcia GUILLEN if he had any legal status to be in the United States, and Luis Antonio Garcia GUILLEN said he did not.

6. On March 28, 2025, an immigration records check showed that Luis Antonio Garcia GUILLEN is a Mexican citizen who has no authorization to enter or remain in the United States. Immigration records also revealed that Luis Antonio Garcia GUILLEN previously has been removed from the United States pursuant to a valid removal order. On March 10, 2011, Luis Antonio Garcia GUILLEN was ordered removed by an immigration judge and on March 25, 2011, was removed from the United States.

7. Immigration records reflect that Luis Antonio Garcia GUILLEN has not received express consent to reapply for admission into the United States from the United States Attorney General and/or the Secretary of Homeland Security since his last removal. Immigration records show no pending applications with Citizenship and Immigration Services. Luis Antonio Garcia

GUILLEN does not appear to be eligible for any relief under the Immigration & Nationality Act (INA), as amended.

8. Therefore, I am requesting a warrant authorizing the arrest of Luis Antonio Garcia GUILLEN, for a violation of 8 U.S.C. § 1326(a).